

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

JOSEPH HALL III,

Defendant.

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Case No.: 1:18-cr-00334

The Honorable T. S. Ellis, III

STATEMENT OF FACTS

The United States and the defendant, JOSEPH HALL III (the "Defendant"), agree that the United States would have proven the following facts at trial, beyond a reasonable doubt, with admissible and credible evidence:

1. On or about November 13, 2017, the defendant negotiated with Travaun Davis to purchase a Hi-point (Iberia Firearms), Model JCP, .40 caliber pistol, Serial Number X7264761 (hereinafter Hi-point Firearm).
2. Later, the defendant arranged the sale of the same Hi-point Firearm to Michael Conway. On the day of the sale, the defendant exercised dominion and control over the Hi-point Firearm when he picked up Davis, who had the firearm, and took Davis and the firearm to the arranged meeting location for the sale.
3. The Hi-point .40 caliber pistol is a firearm pursuant to Title 18, United States Code, Section 921(a)(3) and is not manufactured in the Commonwealth of Virginia. Any Hi-point .40 caliber pistol therefore found in the Commonwealth of Virginia has traveled in

interstate commerce from its point of manufacture outside of the Commonwealth of Virginia into the Commonwealth of Virginia.

4. Prior to this transaction, the Defendant had been convicted of the following felony offense: Grand Larceny, in violation of Code of Virginia § 18.2-248, Spotsylvania Circuit Court, sentenced on June 9, 2014.


5. The acts taken by the Defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully, knowingly, and with the specific intent to violate the law, and were not committed by mistake, accident or other innocent reason.

6. This statement of facts includes those facts necessary to support a guilty plea. It does not include each and every fact known to the Defendant, or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the Defendant's case.

Respectfully submitted,

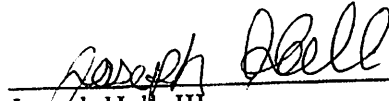
G. Zachary Terwilliger
United States Attorney

By:


Speare Hodges
Special Assistant United States Attorney
Michael P. Ben'Ary
Colleen E. García
Assistant United States Attorneys

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Joseph Hall III, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

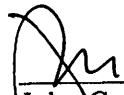
Date: 5 Nov 2018



Joseph Hall, III
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have carefully reviewed the above statement of facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 5 Nov 2018



John C. Kiyonaga, Esq.
Counsel for Defendant